

December 22, 2008

Reply to: Columbia
Email: shamm@richardsonplowden.com
Private Line: 803-576-3713

Charlie L. A. Terreni
Chief Clerk & Administrator
ATTN: Docketing Department
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Carraways Treasures & Collectibles v. Verizon South, Inc., et al
Docket No. 2008-347-C

Dear Mr. Terreni:

Enclosed for filing on behalf of Verizon South, Inc., is the original and twenty-five (25) copies of its Direct Testimony in the above referenced matter. By copy of this letter and certificate of service, all parties of record are being served by U.S. Mail with a copy of the Testimony.

Thank you for your assistance in this matter.

Yours very truly,

RICHARDSON, PLOWDEN, &
ROBINSON, P.A.


Steven W. Hamm

SWH/ceb

cc: Stan Bugner
D.L. O'Roark, Esquire
Richard Carraway
Jeffrey M. Nelson, Esquire
Patricia J. Thompson, Esquire
William E. DuRant, Jr., Esquire

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PUBLIC SERVICE
COMMISSION

OK O'Roark
OK O'Duke
S. W. Hamm

STATE OF SOUTH CAROLINA

(Caption of Case)

IN RE:

Carraways Treasures & Collectibles
Complainant

vs.

Verizon South, Inc., and Farmers
Telephone Cooperative, Inc.,BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 347 - C

(Please type or print)

Submitted by: Steven W. Hamm, Esquire

SC Bar Number: 1692

Telephone: 803-771-4400

Fax: 803-779-0016

Other:

Address: Richardson, Plowden & Robinson, P.A.

1900 Barnewell Street

Columbia, South Carolina 29201

Email: shamm@richardsonplowden.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☒ Other: Direct Testimony/Affidavit

INDUSTRY (Check one)

NATURE OF ACTION (Check all that apply)

- ☐ Electric
- ☐ Electric/Gas
- ☐ Electric/Telecommunications
- ☐ Electric/Water
- ☐ Electric/Water/Telecom.
- ☐ Electric/Water/Sewer
- ☐ Gas
- ☐ Railroad
- ☐ Sewer
- ☒ Telecommunications
- ☐ Transportation
- ☐ Water
- ☐ Water/Sewer
- ☐ Administrative Matter
- ☐ Other: _____

- ☒ Affidavit
- ☐ Agreement
- ☐ Answer
- ☐ Appellate Review
- ☐ Application
- ☐ Brief
- ☐ Certificate
- ☐ Comments
- ☐ Complaint
- ☐ Consent Order
- ☐ Discovery
- ☐ Exhibit
- ☐ Expedited Consideration
- ☐ Interconnection Agreement
- ☐ Interconnection Amendment
- ☐ Late-Filed Exhibit
- ☐ Letter
- ☐ Memorandum
- ☐ Motion
- ☐ Objection
- ☐ Petition
- ☐ Petition for Reconsideration
- ☐ Petition for Rulemaking
- ☐ Petition for Rule to Show Cause
- ☐ Petition to Intervene
- ☐ Petition to Intervene Out of Time
- ☒ Prefiled Testimony
- ☐ Promotion
- ☐ Proposed Oder
- ☐ Protest
- ☐ Publisher's Affidavit
- ☐ Report
- ☐ Request
- ☐ Request for Certification
- ☐ Request for Investigation
- ☐ Resale Agreement
- ☐ Resale Amendment
- ☐ Reservation Letter
- ☐ Response
- ☐ Response to Discovery
- ☐ Return to Petition
- ☐ Stipulation
- ☐ Subpoena
- ☐ Tariff
- ☐ Other: _____

Print Form

Reset Form

Before
The Public Service Commission of
South Carolina

In Re:

Carraways Treasures & Collectibles)

)

v.)

Verizon South and Farmers)

Telephone Cooperative, Inc.)

Docket 2008-347-C

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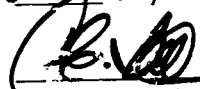
AFFIDAVIT OF STAN BUGNER

I, Stan Bugner, under penalty of perjury, affirm and state this 22nd day of December, 2008:

1. That my name is Stan Bugner. I am the State Director - Public Affairs, Policy and Communications of Verizon Communications. My office is located at 1301 Gervais, Suite 825, Columbia, South Carolina 29201.
2. That attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Verizon South, Inc., having been prepared in written form for introduction into evidence in the above-captioned docket.
3. That I have knowledge of the matters set forth therein.
4. That I hereby affirm that my answers contain in the attached testimony to questions propounded, including any attachment thereto, are true and accurate to the best of my knowledge, information and belief.


Stan Bugner

SWORN to before me this
22nd day of December, 2008.

 (L.S.)
Notary Public for South Carolina

My Commission Expires: August 13, 2014

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2008-347-C

IN RE:)
Carraways Treasures & Collectible)
Complainant)
vs.)
Verizon South, Inc., and Farmers)
Telephone Cooperative, Inc.,)
_____)

CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, December 22, 2008 (1) copy of Verizon's Direct Testimony in the above referenced docket by placing a copy of same in the care and custody of the United States Postal Service, first class postage prepaid to the following Parties of Record:


Richard Carraway
Carraways Treasures &
Collectibles
2495 West Hwy 378

Jeffrey M. Nelson, Esquire
Office of Reulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

William E. DuRant, Jr., Esquire
Schwatz, McLeod, DuRant & Jordan
10 Law Range
Sumter, South Carolina 29150

Stan Bugner
Public Affairs, Policy &
Communications
Verizon
1301 Gervais Street, Suite 825
Columbia, S.C. 29201

Dulaney L. O'Roark, Esquire, III
Vice President & General COunse, Southeast Region
Legal Department
5055 North Point Parway
Alpharetta, Georgia 30022



Carl E. Bell
Paralegal to Steven W. Hamm, Esquire
Richardson, Plowden & Robinson, P.A.
1900 Barnwell Street
Columbia, South Carolina 29201

December 22, 2008
Columbia, South Carolina

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COMMISSION

**Before
The Public Service Commission of
South Carolina**

In Re:

Carraways Treasures & Collectibles)

v.)

Verizon South and Farmers)

Telephone Cooperative, Inc.)

Docket 2008-347-C

**RECEIVED
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SOUTH CAROLINA
PUBLIC SERVICE
COMMISSION**

**DIRECT TESTIMONY
OF
STAN BUGNER
ON BEHALF OF VERIZON SOUTH, INC.**

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Stan Bugner. My business address is 1301 Gervais, Suite 825, Columbia, South Carolina 29201.

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by Verizon Communications in the position of State Director - Public Affairs, Policy and Communications.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND TELECOMMUNICATIONS EXPERIENCE.

A. I have a Bachelor of Business Administration degree with a major in Accounting and minor in Finance and Economics degree from the University of Oklahoma. I began my telecommunications career in June of 1979 as an accounting supervisor for GTE of the Southwest. I held several accounting positions with various business units of GTE, now a part of Verizon, and assumed my current position in October of 1991.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my testimony is to explain why the Commission should not grant the request of Carraway's Treasures & Collectibles ("Carraway's") to switch its regulated telephone service from Verizon to Farmers Telephone Cooperative, Inc. ("Farmers").

Q. WHAT SERVICE IS CARRAWAY'S REQUESTING THAT IT BE PERMITTED TO RECEIVE FROM FARMERS?

A. It is not clear. The complaint does not specify whether Carraway's wants to receive broadband service or telephone service from Farmers and the complainant has not filed testimony that might have clarified this issue.

Q. IF CARRAWAY'S IS REQUESTING BROADBAND SERVICE, HOW SHOULD THE COMMISSION RESPOND?

A. If Carraway's is requesting that Farmers provide broadband service, the Commission should dismiss the complaint because it does not have jurisdiction over broadband service. In any event, Farmers does not need the Commission's permission to provide broadband service and therefore nothing prevents Carraway's from ordering broadband service from Farmers today.

Q. IF THE REQUEST IS FOR TELEPHONE SERVICE, HOW SHOULD THE COMMISSION RESPOND?

A. If Carraway's is requesting that Farmers provide telephone service, the Commission should deny the request because the Carraway's property is not in Farmers' certified territory.

Q. DOES CARRAWAY'S ALLEGE THERE HAVE BEEN ANY PROBLEMS WITH VERIZON'S TELEPHONE SERVICE?

A. No. Carraway's does not allege any concerns or problems with Verizon's telephone service, which suggests that the real purpose of its complaint is to obtain broadband service from Farmers, which, as I have discussed, concerns a matter outside the Commission's jurisdiction.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.